

**BECKER & POLIAKOFF LLP**

Helen Davis Chaitman

[HCHAITMAN@BECKER-POLIAKOFF.COM](mailto:HCHAITMAN@BECKER-POLIAKOFF.COM)

45 Broadway

New York, New York 10006

Telephone (212) 599-3322

*Attorneys for Marsha Peshkin  
and the investors listed on Exhibit A.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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:  
SECURITIES INVESTOR :  
PROTECTION CORPORATION, :  
:  
Plaintiff, : Adv. Pro. No. 08-01789 (BRL)  
:  
v. : SIPA LIQUIDATION  
: (Substantively Consolidated)  
BERNARD L. MADOFF INVESTMENT :  
SECURITIES LLC, :  
:  
Defendant. :  
:  
----- X  
:  
In re: :  
:  
BERNARD L. MADOFF, :  
:  
Debtor. :  
:  
----- X

**DECLARATION OF HELEN DAVIS CHAITMAN IN FURTHER SUPPORT OF  
MOTION TO COMPEL THE TRUSTEE TO PROVIDE A REPORT OF HIS  
INVESTIGATIVE ACTIVITIES AND THE FINANCIAL AFFAIRS OF BLMIS**

I, Helen Davis Chaitman, hereby declare, under penalty of perjury pursuant to 28 U.S.C.

§1746, as follows:

I am a partner with Becker & Poliakoff LLP, counsel to Marsha Peshkin, and a large group of other customers of Bernard L. Madoff Investment Securities Inc. ("BLMIS"). A non-exclusive list of my clients is set forth on **Exhibit A** attached hereto (the "Customers"). I am a member of the bars of New York and New Jersey, and of this Court. I submit this declaration in support of the Movants' motion to compel the Trustee to produce the underlying documents concerning his investigation into the affairs of BLMIS.

1. A true and correct copy of the June 3, 2011 letter from Congressman Scott Garrett, Chair of the House Subcommittee on Capital Markets, Insurance, and Government-Sponsored Enterprises, to Gene L. Dodaro, Comptroller General of the United States, is attached hereto as **Exhibit B**.
2. I declare under penalty of perjury that the foregoing is true and correct.

June 14, 2011

/s/ Helen Davis Chaitman